

# EXHIBIT D

Scott Guelcher

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON

IN RE: ETHICON, INC., PELVIC  
REPAIR SYSTEM PRODUCTS  
LIABILITY LITIGATION

)  
)  
)  
)  
)

THIS DOCUMENT RELATES TO THE  
FOLLOWING CASES IN WAVE 1 OF  
MDL 200:

) Master File No.  
) 2:12-MD-02327  
) MDL 2327  
)

Marty Babcock v. Ethicon, Inc.  
Civil Action No. 2:12-cv-01052

) JOSEPH R. GOODWIN  
) U.S. DISTRICT  
) JUDGE

[Complete caption below]

)

DEPOSITION OF

SCOTT GUELCHER

Taken on behalf of the Defendants

March 23, 2016

8:51 a.m.

GOLKOW TECHNOLOGIES, INC.  
877.370.3377 ph | 917.591.5672 fax  
deps@golkow.com

Golkow Technologies, Inc. - 1.877.370.DEPS

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1 MR. BOWMAN: Object to form.

2 THE WITNESS: I'd have to refresh  
3 myself with the documents. I -- I -- I can't  
4 remember them.

5 BY MR. HUTCHINSON:

6 Q. And as a material scientist, you'll  
7 agree that PROLENE has a different chemical  
8 composition than pure polypropylene, correct?

9 A. So PROLENE has two antioxidants, one  
10 designed to prevent oxidation during  
11 high-temperature processing, another during  
12 storage. There are flow additives designed to make  
13 extrusion easier, calcium stearate, some  
14 surfactants. So there's other additives in there,  
15 but those additives are added mainly for  
16 manufacturing, in my understanding.

17 Q. Right. But PROLENE has a chemical  
18 different composition -- strike that.

19 PROLENE has a different chemical  
20 composition than pure PROLENE, correct?

21 MR. BOWMAN: Object to form.

22 BY MR. HUTCHINSON:

23 Q. I'm sorry. PROLENE has a different  
24 chemical composition than pure polypropylene,

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1 correct?

2 A. Well, the -- yeah, the composition's  
3 different because it has these additives.

4 MR. HUTCHINSON: I'm sorry. Did he say  
5 "well, yeah"?

6 (Whereupon the previously mentioned  
7 answer was read back by the reporter.)

8 THE WITNESS: I probably said -- yes,  
9 it's -- it has additives.

10 BY MR. HUTCHINSON:

11 Q. Doctor, turn to Exhibit 1. I'll  
12 represent to you and the Court that there are 44  
13 different plaintiffs named on the notice of  
14 deposition, starting with Marty Babcock --

15 A. Okay.

16 Q. -- and ending with Thelma Wright.  
17 That's 44 different cases.

18 A. I see.

19 Q. Did you know you were designated in 44  
20 cases in this litigation?

21 A. I -- I didn't know the exact number of  
22 44. I knew it was a wave. So I knew there were a  
23 number of cases, but I wasn't familiar with the  
24 specific plaintiffs because I'm not giving

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## C E R T I F I C A T E

STATE OF TENNESSEE )  
COUNTY OF DAVIDSON )

I, Lise S. Matthews, RMR, CRR, CCP, LCR 353, Licensed Court Reporter and Notary Public, in and for the State of Tennessee, do hereby certify that the above deposition was reported by me, and the transcript is a true and accurate record to the best of my knowledge, skills, and ability.

I further certify that I am not related to nor an employee of counsel or any of the parties to the action, nor am I in any way financially interested in the outcome of this case.

I further certify that I am duly licensed by the Tennessee Board of Court Reporting as a Licensed Court Reporter as evidenced by the LCR number and expiration date following my name below. I further certify that this transcript is the work product of this court reporting agency and any unauthorized reproduction and/or transfer of it will be in violation of Tennessee Code Annotated 39-14-104, Theft of Services.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this \_\_\_\_\_ day of \_\_\_\_\_, 2016.

\_\_\_\_\_  
Lise S. Matthews, RMR, CRR, CRC  
LCR 353 Expiration Date 6/30/2016  
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March 6, 2018